

Robert W. Seiden

Court-Appointed Temporary Receiver for Link Motion Inc. Pursuant to The Honorable Judge Victor Marrero of the United States District Court, Southern District of New York

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VIA ECF

Hon. Victor Marrero
United States Courthouse
500 Pearl Street
New York, New York 10007

October 4, 2022

Re: *Baliga v. Link Motion Inc. et al.*, 1:18-cv-11642 (S.D.N.Y.)

Dear Judge Marrero,

I write to provide the Court with a further status update since my September 22, 2022 letter to the Court (the “September 22 Letter”; ECF 351) regarding the unknown whereabouts of Mr. Lilin “Francis” Guo (“Mr. Guo”), as well as my recent communications with the individual who claims to have received a power of attorney document signed by Mr. Guo (the “Individual”).¹

Since the September 22 Letter to your Honor the Individual told my office that he has had further communications with Mr. Guo’s wife, who told the Individual that due to the “pandemic lockdown” in China, Mr. Guo’s reappearance has been delayed and that Mr. Guo is now estimated to re-appear by the end of October 2022. The Individual further stated that his ability to carry out tasks and duties is limited without direct authorization from Mr. Guo.

Without an official agent in mainland China, and with the limitations of the lockdown, my office is unable to confirm the veracity of the Individual’s statements (including whether he has actually communicated with Mr. Guo’s wife), or the reliability of the information that Mr. Guo’s wife conveyed to the Individual concerning Mr. Guo’s whereabouts. My office intends to stay in contact with the Individual and will continue to keep the Court informed of any further material developments.

Respectfully Submitted,



Robert W. Seiden, Esq.
Court-Appointed Temporary Receiver for
Link Motion Inc.

¹ I am respectfully requesting that we maintain the anonymity of the Individual in light of past and continuing expressed safety concerns.